

COPY

ILLINOIS COMMERCE COMMISSION

JAMES W. PITCHFORD)
MACOUPIN COUNTY HIGHWAY DEPARTMENT)
TOM REINHART, COUNTY ENGINEER)

v.)

UNION PACIFIC RAILROAD COMPANY)

Complaint against Union Pacific Railroad Company)
as to public safety of an abandoned bridge.)

T00-0084

T00-0085

ILLINOIS COMMERCE
COMMISSION
Oct 16 2 36 PM '00
TRANSPORTATION DIV

PETITION FOR LEAVE TO INTERVENE

Petitioner, the Illinois Department of Natural Resources ("Department"), states that it has an interest in the above-entitled complaints and respectfully petitions the Illinois Commerce Commission ("Commission") for leave to Intervene and in support thereof states as follows.

1. That the Department is the state agency charged by Law with, inter alia, the responsibility for statewide management of Illinois' natural resources including the construction of recreational trails throughout the State of Illinois.

2. That the name, address and telephone number of the Petitioner seeking Leave to Intervene is:

Illinois Department of Natural Resources
524 South Second Street, 4th Floor
Springfield, Illinois 62701-1787
(217) 782-1809
Represented by Legal Counsel

3. That the Department has an interest in this proceeding in that any orders entered by the Commission in this proceeding may impede the state's ability to complete the land acquisition and ultimate construction of a bikeway or recreational trail which is within the Statutory responsibility of the Department.

4. Furthermore, the Department may be able to provide information relative to the decision of the Commission on this complaint as it may affect the state's resources including but not limited to recreational trails.

DOCKETED

WHEREFORE, the Illinois Department of Natural Resources prays that this Commission grant it Leave to Intervene and be treated as a party to these proceedings.

Dated this 16th day of October 2000.

Respectfully submitted,
ILLINOIS DEPARTMENT OF NATURAL RESOURCES

By: Stanley Yorkauski, Jr.
Stanley Yorkauski, Jr.
Legal Counsel